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MAR 9 8 1993 MAR 1 9 1993 ROCKY FLATS PLANT CORRESPONDENCE CONTROL

ERD:BKT:02420

FY 93 Work Packages for Operable Units (OU) 8, 9, 10 and 12

Robert Benedetti, Associate General Manager Environmental Restoration Management EG&G Rocky Flats, Inc.

The following work packages have been reviewed by my staff:

OU	WORK PACKAGE NO.	DATE PREPARED
8	12081	2/5/93
9	12091	12/18/92
10	12101	2/5/93
12	12121	2/5/93

Given the limited funding available for these work packages in FY 93, DOE/RFO believes the proposed scope of non-intrusive activities is the best that can be achieved. We support the use of a single subcontractor to implement the non-intrusive activities at OU's 8, 9, 10, 12, 13 and 14. However, we have several concerns that we request EG&G address.

First, the above-referenced Work Packages are not related to the RFP industrial area IM/IRA. How can we adequately design and implement characterization activities without an understanding of the data requirements and nature of the IM/IRA?

Second, soil gas is included with the FY 93 activities for the OU 8, 10 and 12 Work Packages. However, soil gas is an intrusive technique requiring the insertion of probes five feet below ground level. This will be a concern with regard to buried utilities. In addition, if the decision is made to delay intrusive activities in the RFP industrial area until decontamination and decommissioning have been completed, several years may elapse between the soil gas survey and the soil borings. Were this to happen, the soil gas survey would be a waste of time. If intrusive activities are going to be delayed for an extended period of time, no soil gas surveys should be performed in FY 93. They should be delayed until intrusive activities are scheduled to begin. Please respond by indicating the purpose of the soil gas surveys, their timing relative to intrusive activities and their relation to the industrial area IM/IRA.

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Reviewed for Addressee Corres. Control RFP

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R. Benedetti ERD:BKT:02420

Third, the initial surficial soil sampling (Stage 1) included in FY 93 for OU's 8, 10 and 12 are preliminary in nature and are designed to acquire sufficient data to allow the development of a DQO-based surficial soil sampling program in Stage 2. Is it your intention to complete the industrial area surficial soil sampling in FY 94? If not, it is highly doubtful that surficial soil data collected in FY 93 will be sufficient to support the industrial area IM/IRA.

Fourth, with regard to the industrial area surface water and sediment FSP requested by DOE memorandum ERD:BKT:7722, dated July 16, 1992, where does this fit into your FY 93 non-intrusive characterization efforts? Furthermore, how do surface water and sediment fit into the industrial area IM/IRA?

Fifth, with regard to OU 9, when are you planning to initiate Stage 1 tank activities including integrity testing, sampling, etc. These are non-intrusive activities which could be very beneficial for the industrial area IM/IRA. How do these non-intrusive activities for tanks at OU 9 fit into the industrial area IM/IRA? Removal of contaminants from tanks and yanking tanks are examples of actions which should be considered in the IM/IRA. If possible, we request that these activities be performed in FY 93.

Sixth, with regard to non-intrusive activities at OU 10, how will these activities be performed given the waste removal scenario presented for IHSSs 170, 174 and 176 in EG&G memorandum 93-RF-1320, dated February 10, 1993? In some cases, waste material removal will continue to FY 94.

We request that EG&G look into the concerns raised in this memorandum and respond to DOE/RFO in writing by March 26, 1992.

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Assistant Manager for Transition and Environment Restoration

cc.

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